

1 J. Greg Coulter (State Bar No. 016890)
2 Jamie M. Leach (State Bar No. 037551)
3 Allan S. Rubin (Admitted Pro Hac Vice)

JACKSON LEWIS P.C.

4 2111 East Highland Avenue, Suite B-250
5 Phoenix, AZ 85016
6 Telephone: (602) 714-7044
7 Facsimile: (602) 714-7045

Greg.Coulter@jacksonlewis.com

Jamie.Leach@jacksonlewis.com

Allan.Rubin@jacksonlewis.com

8 John Doran (State Bar No. 012112)
9 Craig Morgan (State Bar No. 023373)

SHERMAN & HOWARD LLC

10 2555 E. Camelback Road, Suite 1050
11 Phoenix, AZ 85016
12 Telephone: (602) 240-3000

jdoran@shermanhoward.com

cmorgan@shermanhoward.com

13 *Attorneys for Defendant*

14 UNITED STATES DISTRICT COURT

15 DISTRICT OF ARIZONA

16 **Rachael Gilburd**, an Arizona Resident;
17 **Andrew Gebhart**, an Arizona Resident; **Daniel**
18 **Featherstone**, an Arizona Resident; **Derek**
19 **Martin**, an Arizona Resident; **Angela**
20 **McGuire**, an Arizona Resident; **Kori Morin**,
21 an Arizona Resident, **Katherine Redas**, an
22 Arizona Resident, **Erin Salava**, an Arizona
23 Resident; **David Vallejo**, a Michigan Resident;
24 and **Nick Vincent**, an Arizona Resident,
25 Individually and on Behalf of All Others
Similarly Situated,

26 Plaintiffs,

27 *v.*

28 **Rocket Mortgage, LLC**, a Michigan limited
liability company,

Defendant.

Case No: 2:23-cv-00010-DLR

**STIPULATION FOR STAY OF
PROCEEDINGS AND
TOLLING OF STATUTE OF
LIMITATIONS**

1 Counsel for Plaintiffs and Defendant (together, the “Parties”) have been engaged
2 in meet and confer discussions over notice as required by the Court’s December 7, 2023
3 Order. During the meet and confer discussions, the parties have agreed to engage in
4 mediation in an attempt to resolve the matter prior to notice.

5 Accordingly, the Parties jointly request that the Court stay all dates and deadlines
6 in this case pending mediation as of the date of this stipulation. The parties will notify
7 the Court of the selected mediator and mediation date on or before January 12, 2024. If
8 the parties are able to select a mediator and a mediation date, the statute of limitations
9 will be tolled through the date of mediation. If the date of mediation or the mediator
10 changes, the parties will promptly advise the Court.

11 If the Parties are unable to agree either on a mediation date or a mediator by
12 January 12, 2024 the Parties will advise the Court of that fact and will provide the
13 supplemental briefing and proposed notice—including any joint notice form and
14 agreement on the notice method, the opt-in period, and Defendant’s production of class
15 members’ names and last known addresses—as required by the Court’s Order of
16 December 7, 2023 (Dkt. No. 76) by January 19, 2024, and the statute of limitation shall
17 remain tolled through that date.

18 The purpose of this stipulation is to attempt reach a negotiated settlement through
19 mediation, and reduce litigation expenses; thus, good cause exists for the stipulation. If
20 such a resolution is reached, the Parties will file a notice of settlement. If such resolution
21 is not reached, the Parties will inform the Court of such. Nothing in this stipulation is
22 intended to waive Plaintiffs’ and putative class members rights to file a future motion to
23 toll the statute of limitations or Defendants right to oppose it. A form of Order is
24 attached.

25 DATED this December 20, 2023.
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27
28

JACKSON LEWIS P.C.

By: /s/ J. Greg Coulter

J. Greg Coulter

Jamie M. Leach

Allan S. Rubin

Attorneys for Defendant

WEILER LAW PLLC

By: James Weiler (with permission)

James Weiler

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2023, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

James Weiler, AZ Bar No. 034371

WEILER LAW PLLC

5050 N. 40th St., Suite 260

Phoenix, AZ 85018

jweiler@weilerlaw.com

Attorney for Plaintiffs

By: /s/ Amalia Tafoya

By: /s/ Amalia Tafoya

4874-7466-6392, v. 2